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April 11, 2025

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court, District of New Jersey  
Martin Luther King Jr. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS (MDL No. 3080)  
Supplemental Briefing on Constructive Notice**

Dear Judge Martinotti,

This firm, together with Jones Day, represents Defendant Sanofi-Aventis U.S. LLC in the above-referenced action. We write on behalf of all parties regarding the Court's order requiring supplemental briefing on the issue of constructive notice.

As directed by the Court, the parties will submit initial briefs on May 2, 2025, and response briefs on May 16, 2025. Plaintiffs and Defendants can respectively submit an initial brief or briefs of up to 30 cumulative pages (to be allocated as they see fit), and a response brief or briefs of up to 20 pages (to be allocated as they see fit). The briefs will be in 12-point font Times New Roman. The parties will electronically file their respective briefs no later than 5:00 PM on each date.

We appreciate the Court's consideration of this submission and ongoing attention to this matter. Should Your Honor find this proposal acceptable, we respectfully request the letter be "So Ordered" and entered on the docket.

Respectfully submitted,

/s/ Liza M. Walsh

Liza M. Walsh

cc: Counsel of Record (via ECF)

IT IS on this 14th day of APRIL, 2025,  
SO ORDERED.

Brian R. Martinotti  
Hon. Brian R. Martinotti, U.S.D.J.